

IN THE DISTRICT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA

RECEIVED
USDC, CLERK GREENVILLE, SC
2014 MAR -6 AM 11:40

GREENVILLE DIVISION

UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Defendant.

CASE NO. 6:13-cr-00170-JMC-1

**DECLARATION
IN SUPPORT OF MOTION FOR COURT
TO RECONSIDER GRANTING
DEFENDANT BOND**

I, GORDON L. HALL, pursuant to 28 U.S.C. (1746), declare as follows:

1. I am competent to state the matters set forth herein;
2. I have first-hand knowledge of the facts stated herein;
3. All the facts herein stated are true, correct and complete, admissible as evidence to the best of my knowledge. If called upon as a witness, I will testify to their veracity;
4. I am a Defendant in this instant Case;
5. On or about March 14, 2013, I was arrested having been charged in an Indictment issued on or about March 12, 2013, and a subsequent Superseding Indictment issued on or about July 9, 2013;
6. On or about April 10, 2013, I appeared before this Court and was denied bond, having been ordered to undergo a psychological evaluation;
7. Since April 10, 2013, I have undergone a psychological evaluation and I have been found to be competent;

8. On or about February 18, 2014, I entered a *nolo contendere* plea to Count 2 pursuant to a plea agreement with the Government;
9. I am currently being held on no bond at the Spartanburg County Detention Facility in Spartanburg, South Carolina;
10. On or about March 3, 2014 I filed an Appearance Bond (ECF NO. 232) with other documents wherein 3 sureties have guaranteed my appearance at any future hearings in this Court;
11. Although I am 60 years of age my physical condition is considered excellent;
12. I am married;
13. I have been a resident of Arizona for over 30 years, and promise unto this Court not to change my residence without prior Court approval;
14. The crimes with which I have been charged with in the instant Case do not involve any violence;
15. I do not pose as a danger to any other person or to the community with which I am a well-respected member of;
16. I promise not to flee and to duly appear in Court in the future at all required hearings;
17. I have an existing residence to go home to in Mesa, Arizona, and close family ties.
18. I have several individuals who will guarantee that I will duly appear in Court in the future at all future court hearings if needed;
19. I have never been involved in alcohol or drugs;
20. I have no problem obtaining employment;
21. I have very good financial resources;
22. I promise unto this Court to be present and available for all necessary Court hearings;

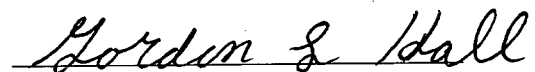
23. I have had two prior convictions regarding white collar nonviolent crimes, and served and appeared at every hearing in California and in New York while a resident of Arizona and never failed to appear at any of the criminal hearings;
24. I missed one civil hearing but it was not intentional as I thought at the time the matter was resolved;
25. I have never attempted to avoid any type of criminal prosecution, nor have I ever failed to appear at any criminal court proceeding;
26. I understand that there may be another matter in Arizona and, if released, do firmly promise to duly appear at any summons or any notice of hearing's in Arizona;
27. There is no irreparable harm if the Motion in which this Declaration supports is granted and no other statutory provisions for granting the relief sought that have not been complied with herein; and
28. Additionally, I sent an Email to William J. Watkins, Jr. regarding his position on the Motion this Declaration is in support of on February 23, 2014, a copy of which is attached hereto and incorporated herein as "Exhibit A." However, no response has been received as of the filing of this Declaration.

I, GORDON L HALL, hereby declare under penalty of perjury under the Laws of the United States of America that the above is true, correct, and complete.

Witness my hand and seal this 5th day of March 2014.

Respectfully submitted,

Gordon L. Hall

A handwritten signature in cursive script that reads "Gordon L. Hall". The signature is written in dark ink and is positioned below the printed name.